

C66-CC - 0239



Focused on
Christ

Involvement
in Community

Reaching
All Ages

Spirit-Centered
Relationships

Teaching
God's Word

First United Methodist Church

903 East Fourth Street
Panama City, Florida 32401

Office 850-763-6537 or Fax 850-785-1421
www.fumc-pc.org

Received & Inspected

MAY 21 2012

FCC Mail Room

May 17, 2012

To whom it may concern:

The attached documentation is true and accurate to the best of my knowledge and contains all required documentation that was requested for granting of a closed captioning exemption for First United Methodist Church of Panama City Florida.

Thank you for your consideration.

Laurie Rodriguez

Laurie Rodriguez
Finance Director/Administrator
First United Methodist Church
Panama City, FL.

FOR NOTARY USE ONLY NOTARY STAMP

Acknowledged before me this 17th day of May 2012

Notary Signature

Carl W. Fountain II

State of Florida

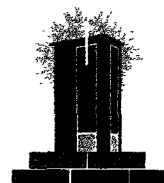
My commission expires 10/6/2014



CARL W. FOUNTAIN II
NOTARY PUBLIC
STATE OF FLORIDA
Comm# EE032786
Expires 10/6/2014

Steve Rascoe
Senior Pastor

Building Together for a
Brighter Tomorrow
"for such a time as this" Esther 4:14





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May 17, 2012

Office of the Secretary
Federal Communications Commission
Attention: Disability Rights Office, Room 3-B431
9300 East Hampton Dr.
Capitol Heights, MD 20743

Re: Petition for exemption from the closed captioning rules

First United Methodist Church is hereby petitioning an exemption from the closed caption requirements for the program "Ten O'clock Worship Service". Closed captioning would result in a significant difficulty and expense to the church. Our sole video programming distributor, WJHG-TV, currently has the capability of this service at a yearly cost of \$16,000.00. We have also obtained numerous quotes from other individual companies that provide this service. The quotes are from \$11,960 - \$23,400.00 per year, plus the set-up fees which are from \$1000.00 - \$1600.00. This would be in addition to our existing yearly cost of \$35,100.00 airtime fee and the salaries of \$18,200.00. We have asked WJHG for assistance in waiving of the closed captioning fees which they have rejected. Please find attached photos of a bulletin that we have prominently displayed to search for television sponsors and captioning assistance. (Note lack of entries for the remainder of the year.) We have been placing calls for help in the church newsletter and bulletins as well as mass e-mails to members for several months.

Due to decreasing sponsorship from our ageing congregation, this increase would be an undue financial burden and would surely cause us to lose our TV broadcast of 43 years. We are one of the longest running church broadcasts in the country. Donations towards the program do not cover all operating expenses, and the program has always been intended as a service to the community.

First United Methodist Church is a non-profit organization that supports all of its ministries solely through contributions of its members. FUMC operates under a 501c3 tax status and supports the broadcast called "Ten O'clock Worship Service" which airs weekly on our local NBC affiliate, WJHG - TV. This program is a blessing to the community as is expressed on a daily basis from people who are physically unable to attend church and many elderly and disabled people.

As shown by the petition and its attachments, the commission should grant a waiver of the closed captioning requirements in this case, because requiring closed captioning would create an undue burden. The cost of the captioning would be excessively high and would have a significant impact on the Petitioner's operations. Because of the significant difficulty and added expense a waiver is warranted.

Respectfully submitted,

Steve Rascoe
Senior Pastor

***Steve Rascoe
Senior Pastor***

***Rudy Olivo
Associate Pastor***

***Building Together for a
Brighter Tomorrow***

"for such a time as this" Esther 4:14



**FIRST UNITED METHODIST CHURCH
FINANCIAL PERFORMANCE**

Received & Inspected

MAY 21 2012

FCC Mail Room

BUDGET INCOME

YEAR	January	February	March	April	May	June	July	August	September	October	November	December	Year-to-date
2011	84,636.86	68,375.53	63,860.75	73,219.55	84,557.37	57,426.88	96,744.86	57,844.50	60,168.82	101,504.45	65,282.91	89,071.72	902,694.20
2010	78,233.98	78,338.28	75,097.86	71,121.37	76,862.54	64,896.53	77,365.82	78,718.61	72,399.61	87,914.91	56,663.01	126,606.56	944,219.08
2009	69,236.54	85,035.82	121,951.60	77,913.55	76,291.46	64,975.21	67,191.18	86,294.89	67,276.57	63,777.98	84,537.09	93,625.83	958,107.72
2008	66,106.13	76,097.96	116,383.91	81,976.89	69,940.66	79,695.28	80,213.46	84,817.66	78,101.64	86,772.90	80,943.91	124,474.00	1,025,524.40

BUDGET EXPENDITURES

YEAR	January	February	March	April	May	June	July	August	September	October	November	December	Year-to-date
2011	82,316.89	64,816.03	74,137.88	92,300.57	78,686.95	61,759.31	91,627.04	66,111.03	64,954.32	95,823.29	59,007.47	70,161.98	901,702.76
2010	90,540.34	75,857.07	76,286.20	90,204.15	72,465.99	86,146.92	71,710.03	76,389.66	112,034.24	61,001.31	63,158.22		875,794.13
2009	89,109.99	68,494.58	70,075.92	96,899.13	71,192.87	68,578.85	106,617.40	73,000.84	100,795.51	78,989.23	57,533.52	72,406.54	953,694.38
2008	96,960.12	69,500.66	122,130.77	83,370.41	69,064.19	121,110.35	90,731.73	87,312.33	122,727.33	64,186.60	50,949.59	57,156.16	1,035,200.24

BUDGET PERFORMANCE

FACTOR	January	February	March	April	May	June	July	August	September	October	November	December	Year-to-date
BUDGET	83,332.42	83,332.42	83,332.42	83,332.42	83,332.42	83,332.42	83,332.42	83,332.42	83,332.42	83,332.42	83,332.42	83,332.42	999,989.04
INC BUD	1,304.44	(14,956.89)	(19,471.67)	(10,112.87)	1,224.95	(25,905.54)	13,412.44	(25,487.92)	(23,163.60)	18,172.03	(18,049.51)	5,739.30	(97,294.84)
BUD-EXP	(1,015.53)	(18,516.39)	(9,194.54)	8,968.15	(4,645.47)	(21,573.11)	8,294.62	(17,221.39)	(18,378.10)	12,490.87	(24,324.95)	(13,170.44)	(98,286.28)
INC-EXP	2,319.97	3,559.50	(10,277.13)	(19,081.02)	5,870.42	(4,332.43)	5,117.82	(8,266.53)	(4,785.50)	5,681.16	6,275.44	18,909.74	991.44

Total for Budget 2011: \$999,989.12

**Television Ministry
2011**[illegible]

Television Ministry 2011

\$	675.00	\$	350.00
\$	675.00	\$	350.00
\$	675.00	\$	350.00
\$	675.00	\$	350.00
\$	675.00	\$	350.00
\$	675.00	\$	350.00
\$	675.00	\$	350.00
\$	675.00	\$	350.00
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\$	675.00	\$	350.00
\$	675.00	\$	350.00
\$	675.00	\$	350.00
\$	675.00	\$	350.00
\$	675.00	\$	350.00
\$	35,100.00	\$	18,200.00

If you would like to sponsor a TV broadcast, please print your name on the line next to the date you would like to reserve. Next, please fill out the form below with your name and phone number, week requested and the dedication. Finally, place the form in the envelope provided below or give to Laurie in the Finance office. (We will contact you with billing information).

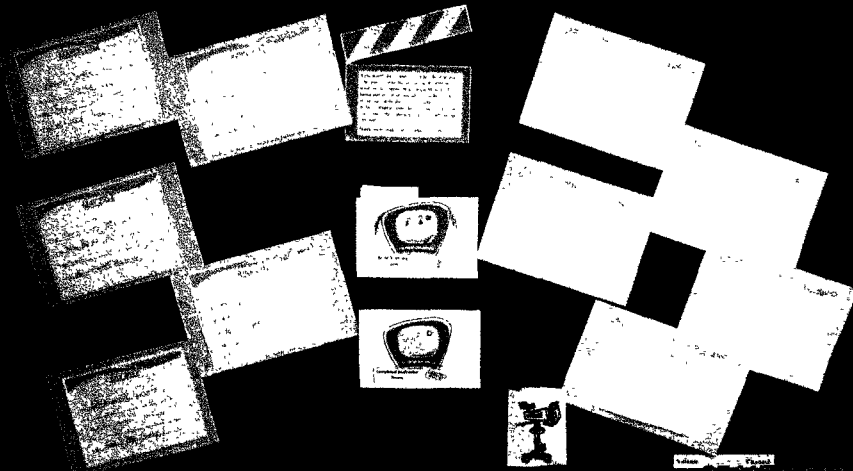
Thank you for making our TV Ministry a success!

AUGUST 2012

- 5 Full Commercial Sponsors
- 12 _____
- 19 _____
- 26 _____

05/17/2012

TV. MINISTRY



JULY 2012

- 1 Half Commercial Sponsors
- 8 _____
- 15 _____
- 22 _____
- 29 Fred & Betty Crosby

05/17/2012

SEPTEMBER 2012

- 2 _____
- 9 _____
- 16 *Ann Bruce*
- 23 _____
- 30 _____

05/17/2012

DECEMBER 2012

- 2 _____
- 9 _____
- 16 _____
- 23 _____
- 30 _____

05/17/2012

OCTOBER 2012

- 7 _____
- 14 *Full Commercial Sponsors*
- 21 _____
- 28 _____

05/17/2012

NOVEMBER 2012

- 4 _____
- 11 _____
- 18 _____
- 25 _____

05/17/2012

Laurie Rodriguez

From: John Daniel [jdjddjdj@gmail.com]
Sent: Wednesday, May 09, 2012 2:05 PM
To: Laurie Rodriguez
Subject: Fwd: Clarification request - captioning requirements..

Received & Inspected
MAY 21 2012
FCC Mail Room

----- Forwarded message -----

From: John Daniel <jdjddjdj@gmail.com>
Date: Wed, May 9, 2012 at 11:53 AM
Subject: Clarification request - captioning requirements..
To: captioningexemption@fcc.gov

Hello.
My name is John Daniel, I am the television director for First United Methodist Church in Panama City, FL.
Case ID CGB-CC-0239

I am contacting you today seeking clarification concerning our closed captioning waiver rejection.
Our letter indicated that our petition did not adequately address section 3:
"Verification that the petitioner has sought closed captioning assistance (e.g. funding services.) from it's video programming distributor; also the extent to which such assistance has been provided or rejected"

I am reading this to say in other, layman's words, "Has First United Methodist Church, contacted our distributor: WJHG - TV Channel 7 - (our one and only output source) to see if they will help defray the costs of providing Closed Captioning services.?" Am I interpreting this correctly?

The answer to that question to WJHG would be yes, we have contacted them, and no, they will not help defray the cost, but referred us to the company they use to do closed captioning.

If I am on the right track as to the meaning, how should I proceed and word this when sending our petition back to the FCC?
also, do I need to have this rejection of help from WJHG in writing?

thanks very much for your time, please feel free to call or email me me if I can be of any help or clarify my questions any further..

John Daniel
Television Director
First United Methodist Church,
Panama City, FL

email: jdjddjdj@gmail.com

Cell phone 850-624-8772
Land line 850-769-6996

Laurie Rodriguez

From: John Daniel [jdjddjdj@gmail.com]
Sent: Wednesday, May 09, 2012 2:04 PM
To: Laurie Rodriguez
Subject: Fwd: ATTN: John Daniel - Re: Closed Captioning Petition CGB-CC-0239

----- Forwarded message -----

From: Roger Holberg <Roger.Holberg@fcc.gov>
Date: Wed, May 9, 2012 at 1:37 PM
Subject: ATTN: John Daniel - Re: Closed Captioning Petition CGB-CC-0239
To: "jdjddjdj@gmail.com" <jdjddjdj@gmail.com>
Cc: captioningexemption <captioningexemption@fcc.gov>

This is in response to your e-mail inquiry regarding the above-referenced petition for an exemption from the Commission's closed captioning requirements. You asked about the requirement for the petition to provide verification that you have sought captioning assistance from your program's distributor. Your e-mail is correct that your program distributor would be the station on which you air your programming - in this case WJHG-TV. You also ask if you need a written confirmation from the station that you sought, and were denied, such assistance. We do not require such documentation regarding this item. Petitioners simply have to verify that they sought the assistance and the station was willing, or, as the case may be, unwilling to provide such assistance. Since petitions must be accompanied by an affidavit or, alternatively, be signed under penalty of perjury, that type of statement alone would be sufficient and no documentation from the station is necessary. If you have such documentation and want to provide it is a decision for you to make but we would not require that type of submission. Nor is there any specified language necessary. All that is necessary is to state that you are verifying that you have sought assistance with the cost of captioning from your program distributor and that your distributor was unable to provide such assistance. You can provide further details if you would like (e.g., the date you sought the assistance, who you spoke with) but that is for you to determine and we do not require such information.

I hope this is helpful.

Roger Holberg

Attorney - Disability Rights Office